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June 5, 2020

VIA ECF

The Honorable Steven I. Locke
Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 840
P.O. Box 9014
Central Islip, New York 11722
(631) 712-5700

**Re: *Hice v. Lemon*, Docket No. 19-cv-04666 (JMA) (SIL)
Joint Proposed Discovery Order**

Dear Magistrate Judge Locke:

Pursuant to Judge Azrack's order dated May 20, 2020 (ECF No. 37), the parties hereby submit a joint proposed discovery schedule, annexed hereto. The parties will make themselves available for a conference with the Court if the Court so directs.

ARMSTRONG TEASDALE, LLP

/s/Caroline J. Polisi
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/s/ Adrienne Levy
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Attorneys for Plaintiff

Cc: All counsel (via ECF)

DISCOVERY PLAN WORKSHEET

Proposed Schedule: Hice v. Lemon, 2:19-cv-04666-JMA-SIL	
Deadline for completion of Rule 26(a) initial disclosures and HIPAA compliant records authorizations:	6/19/2020
Rule 16 Scheduling Conference (jointly requested by parties)	Possible dates: 6/29-7/2, 7/7-7/10
Written Discovery Demands due by:	7/20/2020
Motion to join new parties or amend the pleadings:	9/3/2020
All fact discovery completed by:	12/15/2020
Experts disclosed by:	12/15/2021
Initial Expert Reports due:	1/15/2021
Rebuttal Expert Reports due	2/15/2021
Completion of all discovery	4/5/2021
Dispositive Motions	5/28/2021

In the event that no experts are utilized in this matter, the parties submit the following adjustment to the proposed discovery schedule:

All discovery completed by:	12/15/2020
Dispositive Motions	2/15/2021

NOTE: The fact discovery schedule set forth above is based upon the parties' rough estimate at this time of approximately ten fact witnesses. In the event that a significant number of additional witnesses are identified as discovery progresses, the parties may seek an extension of fact discovery deadlines as may be necessary and appropriate.